

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

NATHAN L. TOPOL,  
Plaintiff,  
v.  
CHASE BANK USA, N.A., JENNIFER  
HAAK and BRIAN HAAK,  
Defendants.

CHASE BANK USA, N.A.,  
Counterclaimant,  
v.  
NATHAN L. TOPOL,  
Counter-defendant.

CHASE BANK USA, N.A.  
Cross-claimant,  
v.  
JENNIFER HAAK and BRIAN HAAK,  
Cross-defendant.

**STIPULATION TO EXTEND TIME FOR  
DEFENDANT CHASE BANK TO FILE  
ITS RESPONSE TO PLAINTIFF'S  
MOTION TO DISMISS FEDERAL  
CLAIMS AND REMAND TO STATE  
COURT ; ORDER**

Case No. 3:08-cv-00343-LRH-RAM

Judge Larry R. Hicks  
Magistrate Judge Robert A. McQuaid, Jr.

The parties hereto, by and through their undersigned counsel, hereby stipulate and agree to extend the time period for Defendant Chase Bank USA, N.A. ("Chase") to file its response to *Plaintiff's Motion to Dismiss Federal Claims and Remand to State Court for Determination of*

1 *Motion to compel and Other State Law Claims, and/or Opposition to Motion to Compel and*  
 2 *Request for Evidentiary Hearing* [docket entry no. 29], from January 5, 2008, through and  
 3 including January 16, 2009.

4 No previous extensions of time have been sought by Chase. Plaintiff's Motion was filed  
 5 on December 19, 2008. An extension is requested because counsel for Chase's availability over  
 6 the holiday season has been limited and Plaintiff's motion raises several new issues that require  
 7 additional time to respond. The parties state that the present Stipulation for Extension of Time is  
 8 made in good faith, not for purpose of delay, and there is good cause for the extension.

9 DATED this 30th day of December, 2008.

10 PARSONS BEHLE & LATIMER

11 By: David R. Hall

12 DAVID R. HALL  
 13 Nevada Bar No. 9571  
 14 201 South Main Street, Suite 1800  
 15 Salt Lake City, UT 84111  
 16 Tel: (801) 532-1234  
 17 Attorneys for Chase Bank USA, N.A.

18 MORRIS PICKERING & PETERSON

19 By: William E. Peterson

20 WILLIAM E. PETERSON  
 21 Nevada Bar No. 1528  
 22 6100 Neil Road, Ste. 555  
 23 Reno, NV 89511  
 24 Tel: (775) 829-6000  
 25 Attorneys for Nathan L. Topol

26 IT IS SO ORDERED:

27 Larry R. Hicks

28 LARRY R. HICKS  
 UNITED STATES DISTRICT JUDGE